



January 7, 2019

Mr. Patrick Pulupa, Esq., Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite #200
Rancho Cordova, California 95670-6114

RE: RICE PESTICIDE PROGRAM SUMMARY OF THE EXISTING 2018
MANAGEMENT PRACTICES AND 2019 RECOMMENDATIONS

Dear Mr. Pulupa:

The California Rice Commission (CRC) manages the Rice Pesticide Program (RPP) and implements water quality monitoring and reporting activities in compliance with the Conditional Prohibition of Discharge requirements found in the Basin Plan for certain rice pesticides. Monitoring and reporting requirements for the RPP are specific to thiobencarb and found in Resolution No. R5-2010-9001.

This letter serves as a review of the 2018 RPP and offers recommendations for the 2019 program approval for your consideration.

Monitoring Summary

In 2018, there was one exceedance of the 1.5 $\mu\text{g/L}$ thiobencarb Basin Plan Performance Goal. The exceedance of 1.7 $\mu\text{g/L}$ occurred at the Colusa Basin Drain 5 (CBD5) site (Colusa County) on May 29, at the peak of the thiobencarb use season. We witnessed a recovery to 1.3 $\mu\text{g/L}$ at the next sample event with levels of non-detect (0.5 $\mu\text{g/L}$) by June 12.

The cities of Sacramento and West Sacramento had no exceedances of the secondary maximum contaminant level (MCL) at 1.0 $\mu\text{g/L}$. Monitoring showed no results above the detection level of 0.1 $\mu\text{g/L}$.

Overview of the 2018 Season

We staggered the start of the monitoring season for the first time since the CRC began managing the program in 2003. Glenn County, not receiving the late spring storms, had a planting date on schedule for mid-April. The Glenn County Agricultural Commissioner's Office communicated that they received a notice of intent to apply thiobencarb the last week of April. In comparison, several Butte County growers were still in the early stages of field preparation for rice planting.

The CRC began monitoring at the CBD5 site on our typical start date, the last Tuesday in April to capture the Glenn County rice field drainage. We began monitoring at all

sites on May 1, in response to communication from growers and county agricultural commissioner offices with detectable thiobencarb levels starting on May 22.

The sampling schedule continued for the full ten weeks with an end date of July 3. Monitoring results began tapering down to non-detect levels June 12, with the trend continuing through the end of the season. The monitoring results were very positive considering approximately 20,000 additional acres were treated with thiobencarb in comparison to 2017.

County agricultural commissioners in Colusa and Yuba Counties issued violations for negligent early releases. However, the timing of the releases did not coincide with the single performance goal exceedance at CBD5. The CRC attributes the higher level to peak timing of the thiobencarb applications.

Following are key considerations from the 2018 season.

- 1) The most significant change in conditions likely impacting monitoring results was the grounding of the liquid formulation (Abolish 8EC) north of Highway 20 site and west of the Sacramento River.
- 2) The second most significant change was the registration of benzobicyclon (Butte Herbicide) a thiobencarb alternative for sedge weed control. However, thiobencarb usage increased by approximately 20,000 acres even though Butte Herbicide usage doubled in 2018.
- 3) From 2006 to 2013, thiobencarb use declined as a result of sedge weed resistance and the registration of other herbicides. The increase in usage cycled up in 2014 due to a decline in resistance and from drought restrictions on water movement. In 2017, thiobencarb usage was down approximately 40,000 acres from 2016. From our assessment of the current acreage increases, thiobencarb remains an effective herbicide for sedge weed control.
- 4) In 2018, the DPR Enforcement Branch and the county agricultural commissioner offices concurred on an increase in enforcement through higher prioritization of the water holding requirements, which includes seepage inspections. The county agricultural commissioners have historically enforced against water holds and observed seepage. However, inspections for seepage are more relevant to water quality programs with water holding violations specific to pesticide enforcement actions. Seepage is essentially a water hold violation, so it is unnecessary to differentiate the two when a county biologist is performing an inspection.

2019 RPP Recommendations

In developing the following recommendations, the CRC does not propose changes to the program in 2019. The single performance goal exceedance recovered at the next monitoring event and levels continued to drop through the end of the season. The secondary MCL at the city water intakes was not in violation.

The CRC continues to support the following additional requirements in 2019:

- Support voluntary acreage reductions by the registrant within the current manufacturing and distribution limitations. Without acreage limitations in effect, the following requirement is enforced:
- Continue the area in Colusa and Glenn Counties north of Highway 20 and west of Sacramento River with limitations to ground only applications of Abolish 8EC, and full use of Bolero UltraMax and League MVP.

From the RPP Resolution and the 2018 approval letter, the CRC commits to continue the following:

- The CRC will provide aggressive efforts to implement, targeted industry outreach and education to growers, pest control advisers (PCAs), applicators, dealers, and distributors during the 2019 season. Examples include the following:
 - Continuance of the mandatory thiobencarb stewardship meetings.
 - Support CACs permit restrictions against an individual for repeated non-compliance.
 - Increase outreach with emphasis on counties where violations occur through letters, e-communications, and the calricenews.org website.
 - Maintain contact with growers, applicators, and PCAs.
 - Continue funding to counties for off-hours surveillance inspections.
- The CRC plans to continue the approved recommendations as outlined in Resolution No. R5-2010-9001, highlighting the following:
 - Continue to implement the RPP water quality monitoring and reporting activities.
 - Continue stakeholder outreach activities including collaboration with the cities, DPR, CACs, and the Central Valley Regional Water Quality Control Board.

The CRC supports your staff utilizing the stakeholder process and maintaining the practice to facilitate an effective water quality program. Thank you for your consideration of our recommendations. Please contact me if you have any questions, or require additional information.

Sincerely,



Tim Johnson
President & CEO

Mr. Patrick Pulupa
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cc: Ms. Ashley Peters, Central Valley Regional Water Quality Control Board
Ms. Donna Marciano, Department Pesticide Regulation
Mr. Ken Everett, Department of Pesticide Regulation
Mr. Robert Hamilton, Valent, U.S.A. Corporation
Ms. Roberta Firoved, California Rice Commission

